

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Denise M. Campbell

Debtor

Denise M. Campbell

Movant

vs.

Specialized Loan Servicing, Inc.
Ronda J. Winnecour, Trustee

Respondent

CHAPTER 13

NO. 21-21338 CMB

Hearing Date: 12/15/21 at 1:30 p.m.

Related to Doc. No. 51

**RESPONDENT, SPECIALIZED LOAN SERVICING, INC., RESPONSE TO
MOVANT'S MOTION TO COMPEL AND FOR SANCTIONS**

AND NOW, comes the Respondent, Specialized Loan Servicing, Inc. (hereinafter "SLS"), by and through its attorney, Maria D. Miksich, Esquire, and KML Law Group, P.C., and respectfully answers as follows:

1. Admitted in part. By further response, the bankruptcy was filed on June 4, 2021.
2. Admitted.
3. Admitted in part. By further response, a Loss Mitigation Order was entered on September 2, 2021.
4. Admitted.
5. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required. To the extent that a response may be deemed necessary, the Defendant specifically denies the same. By further response, SLS mailed the Debtor a letter explaining the mortgage relief options and results of each option.

6. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required. To the extent that a response may be deemed necessary, the Defendant specifically denies the same.
7. Admitted.
8. Admitted.
9. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required. To the extent that a response may be deemed necessary, the Defendant specifically denies the same.
10. Denied. By further response, in accordance with investor guidelines, the interest rate is not adjusted in situations where there is a significant amount of equity in the property.
11. Denied. By further response, in accordance with investor guidelines, the interest rate is not adjusted in situations where there is a significant amount of equity in the property.
12. Denied.
13. Denied.
14. Denied.

WHEREFORE, Respondent prays that Debtor's Motion to Compel and for Sanctions be denied.

Dated: November 24, 2021

/s/ Maria D. Miksich, Esquire

Maria D. Miksich, Esquire

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